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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**WESTERN WATERSHEDS PROJECT,
OREGON NATURAL DESERT ASS'N,
WILDEARTH GUARDIANS, and CENTER
FOR BIOLOGICAL DIVERSITY,**

Plaintiffs,

v.

**SECRETARY OF THE UNITED STATES
DEPARTMENT OF THE INTERIOR and
BUREAU OF LAND MANAGEMENT,**

Defendants.

Case No. 2:21-cv-00297-HL

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TO OBJECTIONS TO
JUDGE HALLMAN'S FINDINGS &
RECOMMENDATIONS**

Federal Defendants, the Secretary of the United States Department of the Interior (“Interior”) and the Bureau of Land Management, move for an extension—until Tuesday, January 17, 2023—of the deadline to file a response to Plaintiffs’ Objections to Judge Hallman’s Findings and Recommendation (“F&R”), (ECF No. 44). The current deadline to respond is December 27, 2022.

Good cause exists for the requested extension. Due to the holidays, many key personnel at both Interior and the Department of Justice are on leave through the New Year. In addition, agency counsel has conflicting deadlines through January 10. Undersigned counsel will also be traveling during the upcoming holidays and has conflicting deadlines immediately after in other matters.

Undersigned counsel has conferred with counsel for Plaintiffs who indicated that Plaintiffs consent to this request so long as the extension applies to their response to Federal Defendants’ Objections as well.

Because the F&R relate to a motion to dismiss and no further deadlines have been set in this case, the requested extension will not impact any other deadlines or schedules in this case. Therefore, Federal Defendants respectfully request that the Court extend the deadline for both parties to respond to Objections to the F&R until January 17, 2023.

DATED this 20th day of December 2022.

Respectfully Submitted,

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/s/ Shannon Boylan
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